

PRIVACY POLICY

This Privacy Policy contains the mandatory information regarding the collection of personal data by EXPAT ASSISTANT EOOD (Limited Liability Private Company) through our website/web application <https://expatassistant.eu/>, their processing and storage, as well as the rights of persons concerning the protection of their personal data.

By implementing a package of organizational and technical measures, we strive to ensure a high level of personal data security and protection against unauthorized processing, destruction or damage. We are convinced that the correct and legal treatment of personal data maintains the trust in the organization and provides the basis for successful business activity. Protecting the confidentiality and integrity of personal data is an extremely important responsibility that we take very seriously at all times.

INFORMATION REGARDING THE PERSONAL DATA ADMINISTRATOR AND THE PERSON IN CHARGE OF PERSONAL DATA PROTECTION

- Name: “EXPAT ASSISTANT” EOOD (Limited Liability Private Company)
- UIC: 205919212
- Headquarters and address of management: Bulgaria, Sofia, Mladost district, residential complex Mladost 2, bl. 239, entr. 7, fl. 1, apt. 2
- Address for correspondence: Bulgaria, Sofia, Mladost district, residential complex Mladost 2, bl. 239, ent. 7, fl. 1, apt. 2
- Email: expatassistant.office@gmail.com
- Mobile: +359 888872466

INFORMATION ABOUT THE COMPETENT SUPERVISORY AUTHORITY

- Commission for Personal Data Protection
- Address for correspondence: Bulgaria, Sofia 1592, 2 Prof. Tsvetan Lazarov Str.
- Phone: +3592 915 3 518
- Email: kzld@cpdp.bg
- Website: www.cpdp.bg

EXPAT ASSISTANT COLLECTS, PROCESSES AND STORES PERSONAL DATA FOR THE FOLLOWING PURPOSES:

- individualization of a party to the contract and the contact persons in case of signing a contract or an amendment, clarification of the services and execution of the contract;
- management of your offers, inquiries, complaints, comments, as well as any questions related to the provision of technical assistance by e-mail or telephone concerning any of the following issues: how to create an account and recover a forgotten password to access our website/web application;
- registration of a user profile and provision of full functionality of all services provided by us;

- accounting purposes - processing of received payments for the services offered by us, issuing invoices, performing tax and social security control by the relevant competent authorities and other obligations provided for in the Accounting Act, the Tax and Social Security Procedure Code and other regulations concerning keeping proper and lawful accounting;
- providing information to the Commission for Personal Data Protection concerning obligations provided for in the Personal Data Protection Act, Regulation (EU) 2016/679, dated 27th April 2016, and other normative acts;
- statistical purposes.

Upon receipt of your inquiry through one of our contact forms, we will use the contact details provided to us to contact you and provide the information or assistance you need.

TERMS OF PERSONAL DATA STORAGE

EXPAT ASSISTANT EOOD will not store your personal data for a period longer than necessary to achieve the purposes for processing it. Determining the appropriate retention period we take into account the amount and type of personal data, the purposes for processing it, and the possibility for achieving it by other means. We also comply with the relevant legal requirements for the storage of certain categories of data in order to fulfill our obligations arising from a regulatory act or a contract, as well as to protect our legal rights in the event of a claim. We may store some of your personal data for a longer period until the expiration of the relevant statute of limitations in order to protect against any claims regarding the implementation/termination of contracts with us, as well as for a longer period in case of legal dispute until its final resolution by an effective court decision.

PERSONAL DATA OF CUSTOMERS

Purpose: To be correctly identified and to fulfill the contract for service provision.

Grounds for processing: Fulfillment of a contractual obligation – signed contract for our services provision. Fulfillment of a legal obligation - Accounting Act, Value Added Tax Act, Corporate Income Tax Act.

Term of service - 6 years, as of January 1st of the year following the year of termination or fulfillment of the contract in accordance with Art. 110 of the Law on Obligations and Contracts regarding the protection of the rights and interests of the company in case of disputes, and for documents for tax control, audit and subsequent financial inspections - 10 years, as of January 1st of the reporting period following the reporting period, to which they refer according to art. 171 of the Tax-Insurance Procedure Code.

PERSONAL DATA OF CONTRACTORS / SERVICE PROVIDERS

Purpose: To be correctly identified and to fulfill the contract for service provision.

Grounds for processing: Fulfillment of a contractual obligation – signed contract for our services provision. Fulfillment of a legal obligation - Accounting Act, Value Added Tax Act, Corporate Income Tax Act.

Term of service - 6 years, as of January 1st of the year following the year of termination or fulfillment of the contract in accordance with Art. 110 of the Law on Obligations and Contracts regarding the protection of the rights and interests of the company in case of disputes, and for documents for tax control, audit and subsequent financial inspections - 10 years, as of

January 1st of the reporting period following the reporting period, to which they refer according to art. 171 of the Tax-Insurance Procedure Code.

PERSONAL DATA OF PERSONS REGISTERING USER/CUSTOMER PROFILE AT <https://expatassistant.eu/>

Purpose: To be correctly identified and to fulfill the contract for service provision.

Grounds for processing: Fulfillment of a contractual obligation – signed contract for our services provision. Fulfillment of a legal obligation - Accounting Act, Value Added Tax Act, Corporate Income Tax Act.

Term of service - 6 years, as of January 1st of the year following the year of termination or fulfillment of the contract in accordance with Art. 110 of the Law on Obligations and Contracts regarding the protection of the rights and interests of the company in case of disputes, and for documents for tax control, audit and subsequent financial inspections - 10 years, as of January 1st of the reporting period following the reporting period, to which they refer according to art. 171 of the Tax-Insurance Procedure Code.

PERSONAL DATA OF PERSONS WHO PROVIDED IT AS TO PUBLISH COMMENTS, ANNOUNCEMENTS, ETC. AT <https://expatassistant.eu/>

Purpose: To be correctly identified.

Grounds for processing: Consent of the person.

Term of service: until the withdrawal of the given consent.

COLLECTING PERSONAL DATA THROUGH <https://expatassistant.eu/>

You can browse the public part of the of our website/web application content without entering any personal data.

You might be asked to provide data on some website/web application pages in order for us to provide the requested information or service, to register a user profile, as well as in cases when you are willing to contact us. In case of willingness to sign a contract with our company and pay the price for our services through the website/web application, you will also be asked you to provide financial information, including credit and/or debit card number. Our website/web application uses the Stripe Checkout secure online payment service provided by Stripe Payments Europe, Limited, Ireland. The financial information you provide is collected, processed and stored directly by Stripe Payments Europe, Limited, Ireland.

EXPAT ASSISTANT EOOD does not have any access to your financial information. You are not obliged to provide the requested personal information, but if you do not do so, EXPAT ASSISTANT EOOD may not be able to provide you with the requested service or information.

In case you provide your personal data to EXPAT ASSISTANT EOOD via Viber, Skype, WhatsApp, Facebook or other platform/social network, we dully inform you that these platforms/websites/social networks have their own privacy policies and we do not take any responsibility or liability for these rules, insofar as the processing by them cannot be controlled

by EXPAT ASSISTANT EOOD. In this regard, we recommend that you check these policies before sharing with us personal data through these websites/applications/platforms.

EXPAT ASSISTANT EOOD COLLECTS, PROCESSES AND STORES THE FOLLOWING TYPES OF PERSONAL DATA THROUGH THE INTERNET SITE/WEB APPLICATION <https://expatassistant.eu/>:

- name and surname, address, telephone, e-mail and website - this data is necessary to register client's profile and be provided with the information or service requested, as well as to exercise your legal rights;
- bank account number, credit and/or debit card number, CVC code and card validity date - this data is necessary to sign and execute the contracts for the services you requested. No financial information is collected for bank cards in case the customer uses the online secure payment platform Stripe Checkout, built into our website/web application. The Stripe Checkout secure online payment service is provided by Stripe Payments Europe, Limited, Ireland. The financial information you provide is collected, processed and stored directly by Stripe Payments Europe, Limited, Ireland. EXPAT ASSISTANT EOOD does not have access to your financial information. You can get more information about the collection, processing and storage of your financial information at <https://stripe.com/en-bg/privacy>. If you have requested to pay for the ordered service by bank transfer ordering direct payment through your bank account, we will receive information about its number;
- names and e-mail - this data is needed to register a user profile and to be able to comment and rate the published content;
- names, address, Personal Identification Number, date of birth, social security number, tax number or other unique identifier - we collect this data when you have explicitly stated that you wish to be issued a tax invoice for the services ordered as an individual or you are made a request regarding the exercise of your rights;
- telephone and/or e-mail - we collect this data when you have contacted us by e-mail or telephone;
- **information about your use of our website/web application** - IP address, operating system, browser, search queries, content viewed, location, acceptance of the privacy policy, cookie policy and general terms of use of our services.

No special categories of personal data (sensitive data) are collected through our website/web application <https://expatassistant.eu/>.

Personal data is stored until the withdrawal of owner's consent, unless there is another reason on which we are obliged or can continue to process it.

EXPAT ASSISTANT EOOD does not perform automated decision making with data.

If you provide third party's personal information, you must do so only after person's informed consent of how we collect, use, disclose and store personal information in accordance with the present Privacy Policy.

EXPAT ASSISTANT EOOD does not process personal data for marketing purposes.

USE OF COOKIES

In order to provide personalized and adequate services through our website/web application, EXPAT ASSISTANT EOOD needs technology to keep and store information about the way they are used by you. This is done with the help of the so-called Cookies. A cookie is a small amount of data that a website/web application stores on a visitor's computer, mobile or other device. They help our website/web application to recognize and store information about your user preferences (visits, clicks, activity history - information about the content you have viewed and/or the searches you have made). The use of the collected cookies is very limited and is related to technical purposes - improving and personalizing the functionality of our website and our services. The information collected through the use of cookies cannot be linked to a specific person.

To learn more, please see our Cookie Policy.

TRANSMISSION OF PERSONAL DATA FOR THE PROCESSING OF THIRD PARTIES

EXPAT ASSISTANT EOOD does not share, sell, provide or otherwise distribute your personal data to third parties and will not do so in the future, unless required by law or required for the purposes of the contract signed between you and EXPAT ASSISTANT EOOD, or if you have not given your explicit consent.

In certain cases, we will need to provide personal data to state regulatory authorities in our due fulfillment of our legal obligations.

In other cases, personal data may also be provided to our trusted service providers concerning the accounting of our activities, the audit of our financial statements, our obligations to national regulators, our legal services and exercising our legal rights regarding our contract with you - banks, accountants, auditors and legal advisers. All service providers are carefully selected according to their capacity to protect and process personal data. They process your personal data only on the basis of our explicit instructions with due care and confidentiality, in strict compliance with the privacy policy adopted by EXPAT ASSISTANT EOOD.

EXPAT ASSISTANT EOOD does not transfer your personal data to third countries.

Your personal data is not stored outside the EU and the European Economic Area.

Our website/web application may also contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy

policies and that we may not be kept responsible for these policies. Please read these policies before submitting information to these websites.

MEASURES TO PROVIDE PROTECTION OF PERSONAL DATA

EXPAT ASSISTANT EOOD follows strict security procedures when storing your personal data, as well as protecting it from unauthorized access, accidental loss, destruction or damage. The security of your personal data is our priority that we do not compromise with.

EXPAT ASSISTANT EOOD applies organizational, physical, information technology and other necessary means to ensure the security and protection of personal data and monitoring of personal data processing. The data you provide to us online is protected by an encrypted connection using an SSL certificate. SSL is a standard method in the field of encrypting personal data so that it can be securely transferred over the Internet. Personal data is stored on the cloud where it is protected with all modern and appropriate standard hardware and software means of protection - firewalls, anti-virus software, data encryption, etc.

Some of the security measures taken by EXPAT ASSISTANT EOOD are:

- Requirements for collection, processing and storage of personal data are established in internal procedures the observance of which is constantly monitored;
- Any access of EXPAT ASSISTANT EOOD employees to personal data and permission for processing personal data in our database is limited and depends on their job obligations. All EXPAT ASSISTANT employees have obligation of confidentiality they have been introduced to.
- To ensure maximum security in collection, processing and storage of your personal data additional data protection mechanisms are used when needed or appropriate.

EXPAT ASSISTANT EOOD strives to constantly improve the security measures that we have implemented and apply in our business complying it with modern technologies.

PROTECTION OF PERSONAL INVOLABILITY OF CHILDREN

The protection of the personal involability of children is a priority and of primary importance for EXPAT ASSISTANT EOOD. Our website/web application is not intended for or intentionally targeted at children under the age of 16.

YOUR RIGHTS TO PROTECT YOUR PERSONAL DATA

- To request information whether we store your personal data in case we have any - what data is it, on what grounds and for what purpose we process and store it;
- To request access to your personal data (the so-called *data access request*). This allows you to receive a copy of your personal data owned by EXPAT ASSISTANT EOOD and check whether we process them in the manner prescribed by law;

- To request a correction of your personal data available to us. This allows you to correct any incomplete or inaccurate information we hold about you;
- To request the deletion of your personal data (the so-called *right to be forgotten*). This allows you to ask us to delete or remove without undue delay all or part of your personal data in case there is no reason to continue to process and store it. EXPAT ASSISTANT EOOD does not delete the data that it has a legal obligation to store, including its own protection issues concerning court claims against it or proof of its rights;
- To object to the processing of your personal data if we invoke a legitimate interest (or the interests of a third party) and something in your specific situation causes you to object to the processing for this reason. You also have the right to object if we process your personal data for direct marketing purposes;
- request the deletion or removal of your personal data if you have exercised your right to object to their processing in accordance with the previous point;
- To object automatic decision-making, if any, including profiling, i.e. not be subject to any automated decision-making through your personal data or profiling;
- To request a restriction on the processing of your personal data. This allows you to ask us to stop processing your personal data if, for example, you wish to establish its accuracy or the reason for its processing;
- To request transfer of your personal data in electronic and structured form to you or to third party (the so-called *right to data portability*). This allows you to take your data from us in a suitable electronic format and transfer it to third party in a suitable electronic format;
- To withdraw your consent. You may withdraw your consent to process all or part of your personal data, as well as for specific or all purposes of processing. If you have consented to the collection, processing and storage of your personal data for a specific purpose, you have the right to withdraw it at any time in respect of that particular type of processing. Upon being notified you are withdrawing your consent, we will stop processing your data for the purpose or purposes you originally agreed to, unless there is another reason to continue that processing;
- To be notified in the event of a breach of the security of your personal data which may put your rights and freedoms at risk. EXPAT ASSISTANT EOOD will inform you without undue delay and in an appropriate manner when such a violation is established, as well as about the measures that have been taken or are to be taken.

За да упражните някое от изброените по-горе Ваши права, моля, изпратете искане или уведомление в свободен текст по пощата или на e-mail: expatassistant.office@gmail.com, или на адрес: гр. София, р-н Младост, ж.к. Младост - 2, бл. 239, вх. 7, ет. 1, ап. 2.

Имайте предвид, че е възможно да поискаме от Вас конкретна информация, която да ни помогне да потвърдим самоличността Ви и да уважим правото Ви за достъп до информация или някое от останалите Ви права. Целта на тази допълнителна мярка за сигурност е да гарантира, че Вашите лични данни няма да бъдат разкрити пред лица, които нямат право да ги получат.

Упражняването на посочените по-горе права не изисква заплащането на такса от Ваша страна. Възможно е обаче да начислим административна такса в разумен размер, ако Вашата заявка за достъп е очевидно необоснована или при повторяемост или прекомерност на исканията. При подобни обстоятелства е възможно също така да откажем да изпълним заявката.

To exercise any of your rights listed above, please send a request or notification in free text by mail or e-mail: expatassistant.office@gmail.com, or to the address: Sofia, Mladost district, zh.k. Mladost - 2, bl. 239, ent. 7, fl. 1, apt. 2.

Please note that we may ask you for specific information to help us verify your identity and respect your right of access to information or any of your other rights. The purpose of this additional security measure is to ensure that your personal data will not be disclosed to persons who are not entitled to receive it.

The exercise of the above rights does not require the payment of a fee on your part. However, we may charge a reasonable administrative fee if your request for access is clearly unfounded or if the requests are repeated or excessive. In such circumstances, we may also refuse to comply with the request.

EXPAT ASSISTANT EOOD has a data protection officer who observes the adherence of the rules described in this Privacy Policy, in the internal Rules for personal data protection and in the normative acts applicable to the protection of personal data. If you have any questions concerning these rules or the way EXPAT ASSISTANT EOOD processes your personal data, you may contact that person at the following e-mail: expatassistant.office@gmail.com.

If you believe that your privacy rights have been violated, you have the right to file a complaint to the Data Protection Commission. Its address and other contact details were already listed above in this Policy.

CHANGES TO THE RULES DESCRIBED IN THE PRIVACY POLICY

At its discretion, EXPAT ASSISTANT EOOD may change and amplify the current Privacy Policy at any time in compliance with the requirements of current legislation in the field of

personal data protection. In the event of a change, the date of change will be clearly stated. This change will take effect for you and your data after the date stated or from another explicitly stated later date.